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October 28, 2024

**VIA ECF**

Honorable Zahid N. Quraishi  
United States District Court, District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 7050  
Trenton, NJ 08608

**Re: Request for Leave to Respond to United States' Statement of Interest  
and Request for Page Limit Extension for Reply Briefs in *United States  
of America, et al., v. Janssen Products, LP*, No. 12-cv-7758-ZNQ-JBD**

Dear Judge Quraishi:

Janssen and Relators hereby submit this joint letter to: (1) seek the Court's leave for Janssen to file a response to the United States' recently filed Statement of Interest (ECF No. 478); and (2) request a page limit extension for the parties' reply briefs in support of their pending post-verdict motions. Counsel for Janssen and Relators have met and conferred and consent to these requests.

**1. Leave to Respond to the United States' Statement of Interest**

On August 12, 2024, Janssen filed its Rule 50(b) Motion for Judgment as a Matter of Law. (ECF No. 473-1, the "JMOL Motion.") On October 18, 2024, the government filed a Statement of Interest setting forth its position on certain legal issues raised by Janssen in the JMOL Motion. (ECF No. 478.) On that same day, Relators filed their Opposition to Janssen's JMOL Motion, citing the government's Statement of Interest to support one of their arguments. (*See* ECF No. 481 at 73.) Because Janssen contends that the government's submission in this case was not anticipated, and raises arguments and points beyond those contained in Relators' opposition to the JMOL Motion, Janssen respectfully requests that the Court grant it leave to file a response to the Statement of Interest. Janssen proposes to file its response by November 15, 2024, the date its reply brief on the JMOL Motion is due, and the response will not exceed eight pages (i.e., the same length as the government's Statement of Interest).

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**2. Request for Page Limit Extension for the Parties' Reply Briefs**

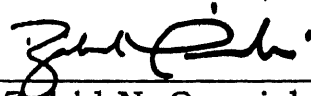
On or before November 15, 2024, Janssen will file reply briefs in support of its JMOL Motion and its Motion for a New Trial under Rule 59 (ECF No. 474-1), and Relators will file their reply brief in support of their Motion for Entry of Judgment (ECF No. 475-1). Pursuant to Local Civil Rule 7.2(b), the parties respectfully request an extension of the default 15-page limit applicable to the parties' reply briefs.

Janssen proposes that the extension to its reply briefs would be proportional to the extensions the Court previously granted for the opening and opposition briefs on Janssen's post-trial motions, *i.e.*, a 25% page limit increase over the default limits set by the local rules. (*See* ECF No. 460.) The Court's approval of this request would result in 38 pages in total for Janssen's two reply briefs.

Relators request a five-page extension to their reply brief. The Court's approval of this request would result in a total page limit of 20 pages for Relators' brief.

The parties submit that these page limit extensions are necessary to allow them to adequately respond to and address the numerous issues raised in the post-trial motion briefing to date, and to preserve their positions for any appeal.

Janssen and Relators thank the Court for its consideration.

So Ordered this 29<sup>th</sup> day  
of OCTOBER, 2024  
  
\_\_\_\_\_  
Hon. Zahid N. Quraishi  
United States District Judge

Respectfully,

/s/ Allison M. Brown  
Allison M. Brown  
Counsel for Janssen

/s/ Pete Marketos  
Pete Marketos  
Counsel for Relators

cc: All counsel of record